

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

THE PROPERTY AND CASUALTY)
INITIATIVE, LLC,)
)
Plaintiff,) C.A. No.: 05-10520-RCL
)
v.)
)
UNITED STATES OF AMERICA,)
acting through the National Credit)
Union Administration,)
)
Defendant.)
)

**DEFENDANT'S ASSENTED TO MOTION FOR EXTENSION OF
TIME IN WHICH TO ANSWER OR OTHERWISE RESPOND TO COMPLAINT**

Now comes the defendant, United States of America,¹ and hereby moves this Court for a thirty-day extension of time **up to and including June 24, 2005**, to answer or otherwise respond to the Complaint. As reasons therefore, the undersigned counsel for the United States asserts that such an extension will allow counsel the necessary time to obtain relevant facts and background information of this matter. Additionally, it is the undersigned counsel's understanding that any extension granted by the Court will be used by the parties to narrow and/or resolve the issues presented in this matter.

The United States asserts that there have been no prior requests for extensions in this action.

¹ This motion is not intended to be a responsive pleading. By the filing of this motion, the United States is not waiving any of the procedural, affirmative, or other waivable and non-waivable defenses available to it in the normal course of filing a responsive pleading. The United States intends to raise those defenses when it answers or otherwise responds to the Complaint.

WHEREFORE, the United States respectfully requests that this Court allows its motion for an extension of time **up to and including June 24, 2005**, to answer or otherwise respond to the Complaint.

Respectfully submitted,

UNITED STATES OF AMERICA,
By its attorney,

MICHAEL J. SULLIVAN
United States Attorney

Dated: May 16, 2005

By: /s/Eugenia M. Carris for Gina Walcott-Torres
Gina Walcott-Torres
Assistant U.S. Attorney
John Joseph Moakley U.S. Courthouse
1 Courthouse Way, Suite 9200
Boston, MA 02210
(617) 748-3369

LOCAL RULE 7.1(A)(2) CERTIFICATION

The undersigned counsel certifies that she conferred with counsel for plaintiff and that he assented to the relief sought herein.

/s/Eugenia M. Carris
Eugenia M. Carris
Assistant U.S. Attorney